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August 28, 2007

Robert Varney
Northeast Regional Administrator, Environmental Protection Agency
1 Congress Street
Suite 1100
Boston, MA 02114-2023

Dear Administrator Varney:

We are writing to request a comprehensive review of alternative options for the consolidation of contaminated soil at the Raymark Industry Superfund sites in Stratford, Connecticut. The EPA currently has a single proposal for which it is seeking public opinion. However, we believe that there are several alternatives that deserve to be fully explored before the EPA pursues a single plan for the remaining Raymark sites.

Raymark Industries operated for 70 years on East Main Street in Stratford, making brakes, clutches, and other manufacturing parts. They used a system of lagoons around the area to dispose of waste—much of which seeped into the soil and contaminated it with various chemicals. In the 1990's, the EPA capped and remediated the main site, and many of the most polluted residential properties. However, there are still about 20 locations around Stratford that contain unremediated contaminated soil.

The EPA is proposing digging the soil up from these two dozen properties and consolidating them in 1-3 locations in south Stratford. Stratford still has \$21 million designated for it in the federal Superfund, and the EPA claims that their proposal will cap all the remaining Raymark waste while still remaining in their current budget.

However, we have a number of concerns about the current proposal. First, no explorations of other viable alternatives have been publicly acknowledged. If there was a more comprehensive process for determining that consolidation was the best course of action, we would like it to be made public. Second, we have serious concerns about the public health implications of moving tons of contaminated soil around the Town of Stratford. Moving a large amount of contaminated soil around town could pose risks of airborne particles, spilled dirt on roads, and a number of other health concerns could result from a massive consolidation. Health concerns could impact the entire town, not just the immediate area. Finally, such a massive consolidation would disrupt daily life in Stratford, with essentially twenty construction sites happening at once in a small geographic area.

We are requesting an evaluation of several different alternatives, and that the results of this evaluation be made public. We have three alternatives in mind, but this is by no means comprehensive. We would welcome additional options if you believe there are other viable ideas that should enter the public debate.

Alternative #1: Moving Contaminants out of Town. Moving the contaminants to pre-selected EPA sites is probably the best way to secure public health in the long term. The EPA has established containment sites for soil like this around the country, including one in Buffalo, NY. We would like to see the detailed cost estimates for such a proposal, as we have been told informally that while this would be the best option environmentally, is cost prohibitive.

Alternative 2: Selective Capping in Place. Another alternative is to use the \$21 million remaining in the Superfund to cap the worst polluted sites and leave the rest uncapped until more money can be secured. The sites have various levels of pollution and some are statistically worse than others. We could cap the worst sites in place and leave those with less pollution for future remediation. The obvious problem with this idea is that it leaves some sites uncapped with no funding secured. However, this option would avoid all the problems with transporting the contaminated soil around town.

Alternative 3: Waiting for Full Funding. A final alternative would be to do nothing—keeping the situation status quo until the funding is secure to cap everything in place. The EPA has previously said that the contaminants in the soil present no clear and present danger to residents (because the worst sites were handled in the 1990's). Thus, an option could be to try to secure the funding to cap all the properties in place. We would like to understand the process for securing more Superfund money, and whether this would require Congressional action or is within the department's purview.

We believe that the EPA needs to provide a clear evaluation of alternatives and we should have public debate about what is best for Stratford. Many residents are already opposed to the plan proposed by the EPA, and we believe a full exploration of alternatives will allow for a constructive dialogue about how best to protect the environment and public health in Stratford.

We look forward to your response, and the plan for evaluate the various alternatives for dealing with the remaining Raymark properties.

Sincerely yours,



Dan Debicella
State Senator



John Harkins
State Representative

Cc: Commissioner Gina McCarthy, Connecticut Department of Environmental Protection
Mayor James Miron, Stratford
US Senators Chris Dodd and Joseph Lieberman
Congresswoman Rosa DeLauro
Stratford Town Council
Raymark Advisory Committee
Stratford Press Corps

